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10 **BEFORE THE**
11 **BOARD OF REGISTERED NURSING**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
13 **STATE OF CALIFORNIA**

14 In the Matter of the Accusation Against:

Case No. *2008-228*

15 SUSAN KAY MORRISON
26065 Saratoga Avenue
Laguna Hills, CA 92653

A C C U S A T I O N

16 Registered Nurse License No. 680249

17 Respondent.

18 Complainant alleges:

19 PARTIES

20 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation
21 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
22 Department of Consumer Affairs.

23 2. On or about June 5, 2006, the Board of Registered Nursing issued
24 Registered Nurse License Number 680249 to Susan Kay Morrison (Respondent). The Registered
25 Nurse license was in full force and effect at all times relevant to the charges brought herein and
26 will expire on November 30, 2009, unless renewed.
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1 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
2 and enforcement of the case.

3 DRUGS

4 9. Darvocet N, a brand name for propoxyphene naphsylate and
5 acetaminophen, is a schedule IV controlled substance as designated by Health and Safety Code
6 section 11057(c), and is a dangerous drug pursuant to Business and Professions Code section
7 4022.

8 10. Ultram is a non-narcotic analgesic dangerous drug pursuant to Business &
9 Professions Code section 4022.

10 CAUSE FOR DISCIPLINE

11 (Unprofessional Conduct: Unsafe Use of Controlled Substance or Dangerous Drug)

12 11. Respondent is subject to disciplinary action for unprofessional conduct
13 under section 2761 in conjunction with 2762(b) in that she uses controlled substances or
14 dangerous drugs to an extent as to be a danger to herself or others or to an extent as to impair her
15 ability to practice safely as a nurse. The circumstances are as follows:

16 A. Respondent moved to California in 2006 from Minnesota, where she has a
17 nursing license. She was a participant in that licensing agency's diversion program for impaired
18 nurses due to her abuse of or addiction to Darvocet-N (her drug of choice) and/or other controlled
19 substance painkillers.

20 B. Respondent also admits to using Ultram more than prescribed off and on
21 for over 5 years. While in the Minnesota diversion program, Respondent relapsed in August,
22 2006.

23 C. Respondent enrolled in the Board's diversion program in California on or
24 about March 16, 2007.

25 D. Respondent tested positive for Ultram on April 25, April 30, May 7,
26 May 10, and May 17, 2007. She did not provide the Board's diversion program with any
27 treatment provider reports documenting the ongoing need for the Ultram and did not use any
28 defined appropriate protocol for receiving such drugs during recovery.

1 E. On June 1, 2007, Respondent was terminated from the Board's diversion
2 program as a risk to public safety.

3 PRAYER

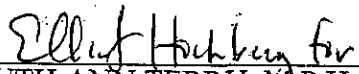
4 WHEREFORE, Complainant requests that a hearing be held on the matters herein
5 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 680249, issued
7 to Susan Kay Morrison;

8 2. Ordering Susan Kay Morrison to pay the Board of Registered Nursing the
9 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
10 Professions Code section 125.3;

11 3. Taking such other and further action as deemed necessary and proper.

12 DATED: 1/25/08

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15 RUTH ANN TERRY, M.P.H., R.N.
16 Executive Officer
17 Board of Registered Nursing
18 Department of Consumer Affairs
19 State of California
20 Complainant
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